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**UNITED STATES DISTRICT COURT**  
**CENTRAL DISTRICT OF CALIFORNIA**

LOS ANGELES PRESS CLUB,  
STATUS COUP,

Plaintiffs,

vs.

CITY OF LOS ANGELES, a municipal  
entity, JIM MCDONNELL, LAPD  
CHIEF, sued in his official capacity;

Defendants.

**CASE NO. 25-CV-05423 HDV-E**

Hon. Hernan D. Vera, Crtrm. 5B  
Magistrate Judge Charles F. Eick, Crtrm. 750

**DEFENDANT CITY OF LOS  
ANGELES'S EX PARTE  
APPLICATION FOR AN  
EXTENSION OF TIME TO  
RESPOND TO PLAINTIFFS' "EX  
PARTE APPLICATION FOR  
CONTEMPT; SANCTIONS";**

**[Filed with Declaration of Cory M.  
Brente and Exhibits; [Proposed]  
Order]**

**DATE: Under Submission  
TIME: Under Submission  
CTRM: 5B (First Street)**

**TO PLAINTIFFS AND THEIR ATTORNEYS OF RECORD:**

**PLEASE TAKE NOTICE THAT** Defendant **CITY OF LOS ANGELES** hereby  
applies to the Court ex parte for an extension of time to respond to Plaintiffs' "Ex Parte  
Application for Contempt; Sanctions" and the hearing date of August 25, 2025.

This Ex Parte Application is made on the grounds that the City has not had sufficient  
time to review all of the Exhibits submitted by Plaintiffs in connection with their Ex Parte  
Application for Contempt; Sanctions and does not have time to review all the materials

1 and provide a meaningful and adequate response to Plaintiffs' Ex Parte Application and  
2 the Court's Order of August 19, 2025 which set the hearing date on this matter for August  
3 25, 2025.

4 Defense counsel gave Plaintiffs' counsel notice of this ex parte application and its  
5 substance on August 20, 2025 via email. Plaintiffs' counsel responded and advised that  
6 Plaintiffs will not agree and will oppose the ex parte application. Defense counsel also  
7 advised Plaintiffs' counsel that Plaintiffs would have 24 hours to oppose this ex parte  
8 application after it is filed.

9 Plaintiffs' counsel may be contacted at:

10 Carol A. Sobel

11 Law Office of Carol Sobel

12 2632 Wilshire Boulevard, No. 552

13 Santa Monica, CA 90403

14 310-393-3055

15 Email: carolsobellaw@gmail.com

16  
17 This Ex Parte Application is based on the attached Memorandum of Points and  
18 Authorities, the Declaration of Cory M. Brente and Exhibits, and upon such evidence as  
19 may be presented at or before any hearing on this issue.

20  
21 Date: August 20, 2025

HYDEE FELDSTEIN SOTO, City Attorney

DENISE C. MILLS, Chief Deputy City Attorney

KATHLEEN KENEALY, Chief Asst City Attorney

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24 By: /s/ *Cory M. Brente*

25 **CORY M. BRENTE, Senior Assistant City Attorney**

26 Attorneys for Defendant City of Los Angeles  
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**MEMORANDUM OF POINTS AND AUTHORITIES**

**I. THE CITY HAS GOOD CAUSE TO BRING THIS EX PARTE APPLICATION, AND RESPECTFULLY REQUEST THAT IT BE GRANTED.**

To bring an ex parte application, the moving party must show good cause for emergency relief. *See Mission Power Eng. Co. v. Continental Casualty Co.*, 883 F. Supp. 488 (C.D. Cal. 1995). Based on the currently set immediate deadlines imposed by the Court and as discussed herein, the City has good cause to bring the instant ex parte application.

On August 13, 2025, Plaintiffs filed an “Ex Parte Application for Contempt; Sanctions” because Plaintiffs believe that the City violated the Temporary Restraining Order issued by this Court on July 10, 2025. In support of their Ex Parte Application, Plaintiffs submitted 27 exhibits, which include several videos and lengthy declarations. The City advised the Court in their Opposition that 24 hours was a wholly insufficient amount of time to thoroughly review the Exhibits and to provide a meaningful response and adequately defend against the claims being asserted. The City requested that the Court set a briefing schedule that would allow sufficient time to prepare a thorough and meaningful response.

However, the Court issued its Order on August 19, 2025 requiring the City to respond in writing to the OSC by August 22, 2025 and to appear at a hearing on August 25, 2025 on the sanctions issue. The City is preparing its written response to the Court’s inquiry on the dissemination issue. As part of its response, the City is providing a copy of the Notice from the Chief of Police to all Los Angeles Police Department sworn members on July 15, 2025 as required by the Court’s Order on the TRO. A copy of that Notice also is submitted with this ex parte application (*see* Exhibit “A” attached to the declaration of Cory M. Brente) and the dissemination process will be explained further in the City’s briefing that is due to be filed on August 22, 2025. However, the 6 days allotted by the Court to prepare for the sanctions hearing, which the City anticipates will be a detailed

1 hearing, is still not a sufficient length of time for the City to thoroughly review all the  
2 materials, including the 27 exhibits, and to adequately and meaningfully defend itself  
3 against the claims being asserted and the request for sanctions. As the City's Opposition  
4 to the Motion for Preliminary Injunction shows, a meaningful and adequate response is  
5 more involved than the time being allowed so far. *See* Docket No. 69, (Opposition to  
6 Motion for Preliminary Injunction). The City will be unfairly prejudiced if more time is  
7 not granted, including the fact that the record will not be fully developed for the appellate  
8 court, should an appeal be necessary.

9  
10 **II. CONCLUSION.**

11 Based on the foregoing, the City respectfully requests that the Court grant the City's  
12 ex parte application and that the City be allowed to have until September 3, 2025 to file  
13 its Opposition to Plaintiffs' "Ex Parte Application for Contempt; Sanctions" and that the  
14 hearing date of August 25, 2025 be continued to a date after September 8 that is convenient  
15 to the Court's calendar.

16  
17 Date: August 20, 2025

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KATHLEEN KENEALY, Chief Asst City Attorney

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20 By: /s/ *Cory M. Brente*

21 **CORY M. BRENT**, Senior Assistant City Attorney  
Attorneys for Defendant City of Los Angeles  
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